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**From:** Rountree, Jillian  
**Sent:** Tuesday, September 22, 2020 7:21 PM  
**To:** Keyt, Bryan  
**Cc:** Jager, Ginger; Ohm, Michael  
**Subject:** RE: US EPA's Request for Information Under 104(e) to Mr. Robert Perez, Hilco Redevelopment Partners, LLC and HRE Crawford LLC

Yes, Monday the 9<sup>th</sup>. Thanks.

*Jillian Rountree*

Attorney, U.S. EPA Region 5  
312-353-3849

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**From:** Keyt, Bryan <bryan.keyt@bclplaw.com>  
**Sent:** Tuesday, September 22, 2020 6:19 PM  
**To:** Rountree, Jillian <Rountree.Jillian@epa.gov>  
**Cc:** Jager, Ginger <jager.ginger@epa.gov>; Ohm, Michael <michael.ohm@bclplaw.com>  
**Subject:** Re: US EPA's Request for Information Under 104(e) to Mr. Robert Perez, Hilco Redevelopment Partners, LLC and HRE Crawford LLC

Jill,

Thank you very much. We will work towards the goal of submitting a response within the Additional 45 day period. Under that additional time period the 45th day would fall on Sunday, November 8. Could we please agree to Monday November 9 which is the next business day?

Thank you for your time and attention.

Best regards,

Bryan

Sent from my iPhone, please excuse any typos

On Sep 22, 2020, at 5:10 PM, Rountree, Jillian <Rountree.Jillian@epa.gov> wrote:

Hello Mr. Keyt,

I am the attorney representing EPA in this matter. I understand from the email below that you are requesting an extension of time to respond to this request, from the original 65 days, for another 65 days. At this time, EPA is willing to extend the time to respond for an additional 45 days. If that is insufficient, please identify parts you can answer now or by that date, and we can discuss extensions of other

questions. If you have any specific questions about the information request, please plan to contact me at least one week before your new due date. Thank you,

Jill

**Jillian Rountree**

Attorney

U.S. EPA Region 5

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[rountree.jillian@epa.gov](mailto:rountree.jillian@epa.gov)

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**From:** Keyt, Bryan <[bryan.keyt@bclplaw.com](mailto:bryan.keyt@bclplaw.com)>

**Sent:** Tuesday, September 22, 2020 7:59 AM

**To:** Jager, Ginger <[jager.ginger@epa.gov](mailto:jager.ginger@epa.gov)>

**Cc:** Ohm, Michael <[michael.ohm@bclplaw.com](mailto:michael.ohm@bclplaw.com)>

**Subject:** US EPA's Request for Information Under 104(e) to Mr. Robert Perez, Hilco Redevelopment Partners, LLC and HRE Crawford LLC

Ms. Jager:

Good morning. I am following up on my prior voice and email messages. Our law firm represents Hilco Redevelopment Partners, LLC and HRE Crawford LLC in connection with the U.S. EPA's Request for Information under Section 104(e) of CERCLA for information associated with the former Crawford power generation facility. EPA's request seeks an extremely large volume of information regarding historic and current environmental conditions at the site and as related to the April 11, 2020 stack implosion incident. Our clients have been diligently working to collect and assemble the significant amount of documents, data and information requested by US EPA, and to prepare concise and responsive answers to each of EPA's 65 questions plus all related subparts. Despite these significant and diligent efforts, our client is in need of additional time to complete its response and provide accurate and complete information. This need for additional time is necessary due not only to the breadth and depth of EPA's requests and our client's need to assess many tens of thousands of pages of reports and information, but also due to additional challenges posed by Covid which has created difficulties for communicating with all the relevant persons who can contribute information or documents, and then reviewing, assessing and assembling the responsive information in a form which will be useful and responsive to EPA's requests. Accordingly, we request an additional 65 days to respond to your request which would make the response due no later than November 28, 2020

We would appreciate it if you would please respond to this message as soon as possible. I can be reached on my [REDACTED]

<[image001.png](#)>

. If I am not available, please contact Mike Ohm at [REDACTED]

<[image001.png](#)>

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Thank you for your prompt attention and response to this matter.

Best regards,

Bryan



**BRYAN KEYT**

Partner

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<image001.png>

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